

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

NANCY HENDERSON and THOMAS
HENDERSON,

Plaintiffs,

vs.

GREYHOUND LINES, INC., et al.,

Defendants

MARRLINA BOLDEN,

Plaintiffs,

vs.

DALE CUNNINGHAM, GREYHOUND
LINES, INC.,

Defendants

BON KIEU,

Plaintiff

vs.

DALE CUNNINGHAM, et al.,

Defendants

CASE NO.: 3:07cv916-MEF

CASE NO.: 3:07cv917-MEF

CASE NO.: 3:07cv1020-MEF

INITIAL DISCLOSURE UNDER RULE 26 BY PLAINTIFF

Plaintiff, Marrlina Bolden, (hereinafter "Plaintiff"), hereby submits her initial disclosures pursuant to Rule 26.

LIST OF WITNESSES WHO MAY BE CALLED

NAME	DESCRIPTION
Marrlina W. Bolden 200 Thomas Street Franklin, LA 70538-1305	Testimony about the accident and her medical condition.
Makiah Bolden 200 Thomas Street Franklin, LA 70538-1305	Testimony about the accident and the plaintiff's medical condition prior to and after the accident.
Family Member	Testimony about the accident and the plaintiff's medical condition prior to and after the accident.
Corporate representative of GREYHOUND LINES, INC., and any other named defendant.	<p>Testimony as to the safety, training, policies and procedures, maintenance and other issues plead as negligence against Greyhound and inherent in the pleadings.</p> <p>All wage, employment records, work assignments and job description regarding Dale Cunningham. Testimony as to the happening of the incident and the injury to plaintiff; about the work performed and procedures. Safety procedures or lack thereof on the various buses.</p> <p>Dale Cunningham will testify as per his deposition.</p>
Dale Cunningham 517 Fond du Lac Drive Stone Mountain, Ga, 30088	Testimony about the accident, job assignments and safety procedures and per his deposition.
Marshall Wayne Walters 5017 South Mill Road Hope Mill, NC 28348	Testimony about the accident.
Jacqueline Drew 2555 East Daniels Road Mobile, AL, 36605	Testimony about the accident.
Evelyn Johnson 2641 Daniel Turner Trailer Court Houma, LA, 70363	Testimony about the accident.
Lisa Duty 85 Carden Road Seale, AL, 36875	Testimony about the accident.
Jonathan Stephens 5800 Windsor Drive Columbus, GA, 31909	Testimony about the accident.
Nancy Henderson 2400 Canter Drive	Testimony about the accident.

Phenix City, AL 36867	
Robert Howell 1623 Brevard Road Hendersonville, NC 28891	Testimony about the accident.
Brashelle Henry 12625 Coursey Blvd Apt 1054 Baton Rouge, LA 70816	Testimony about the accident.
Other individuals who were passengers on the bus.	Testimony about the accident.
Investigating officer D. Darrah III, Officer ID number 078 per police report	His investigation and report of the accident.
Investigating officer Sgt. D. Stokes per police report	His investigation and report of the accident.
Dr. Darrell Everhart, Franklin Chiropractic Clinic, 1305 Main Street, Franklin, Louisiana. Houma, LA 70360	Treating Physician. Testimony as to the medical condition of plaintiff.
Dr. Boyd Snellgrove, Acadiana MRI, 2309 East Main Street, Suite 100, New Iberia, Louisiana;	Expert Radiologist. Testimony as to the medical condition of plaintiff regarding MRI films and report.
Morteza Shamsnia, M.D. Advanced Neurodiagnostic Center 2905 Kingman Street Metairie, LA 70006	Treating Physician. Testimony as to the medical condition of plaintiff.
Dr. Wm. Andre Cenac 1307 Old Jeanerette Road, Suite 100 New Iberia, LA 70563	Treating Physician. Testimony as to the medical condition of plaintiff.
Dr. Bernard A. Landry, Eastbank Imaging, 3434 Houma Boulevard, Suite 100, Metairie, Louisiana;	Expert Radiologist. Testimony about MRI films and report.
Dr. John Cobb, Lafayette Bone and Joint Clinic, 1211 Coolidge Street, Suite 100, Lafayette, Louisiana	Treating Physician. Testimony as to the medical condition of plaintiff
Lafayette Surgical Specialty Hospital 1101 Kaliste Saloom Road Lafayette, Louisiana	Testimony as to the medical condition of plaintiff.
Crystal Benoit, PT, Franklin Foundation Hospital, 1501 Hospital Avenue, Franklin, Louisiana;	Testimony as to the medical condition of plaintiff.
Columbus Medical Center 710 Center Street Columbus, Georgia 31901	Testimony as to the medical condition of plaintiff.

Record custodians of health care providers	Medical treatment and bills.
Other doctors that may have treated plaintiff or that she will treat with in the future.	Treating physicians.
Accident reconstruction/Bus and trucking expert	Expert as per his deposition and report.
Vocational Expert, likely Bobby Roberts, Metairie, LA.	Expert as per his deposition and report.
Economist, likely G. Randolph Rice, Baton Rouge LA.	Expert as per his deposition and report.
Any witness listed by any party in this case, including any witness identified in the discovery process.	
Any witness needed to authenticate an item to be introduced into evidence.	
Any person deposed in this matter.	

EXHIBITS

Exhibits that may be introduced by plaintiff:

NO	DESCRIPTION
P-1	Any accident reports
P-2	Pictures of accident area and vehicles involved
P-3	Pictures of plaintiff and family/friends before and after accident
P-4	Plaintiff's wage records and earnings records.
P-5	Plaintiff's Tax returns
P-6	Medical records and bills for treatment of plaintiff
P-7	Charts and diagrams of the human anatomy of plaintiff.
P-8	Corporate records, safety records and maintenance records of defendants.
P-9	Charts, pictures and diagrams of the accident scene.
P-10	Expert reports
P-11	Any exhibit attached to a deposition or produced by the plaintiff in Discovery
P-12	Any exhibit listed and/or utilized by any other party to this litigation produced in discovery or attached to a deposition.
P-13	Any document discovered during the course of the litigation
P-14	Any document listed by any other party

Respectfully submitted,

CUERIA LAW FIRM, L.L.C.

By: /s/ R. Brent Cueria
R. BRENT CUERIA (#18176)
CUERIA LAW FIRM
700 Camp Street – Suite 316
New Orleans, LA 70130
Tel: (504) 525-5211
Fax: (504) 525-3011
Attorney for the Plaintiff, Marrlina Bolden.

William J. Benton, Jr. (BEN.018)
1214 7TH Ave., P.O Box 2850
Phenix City, AL 36867-2850
Tel: (334) 297-6534

CERTIFICATE

I hereby certify that a copy of the foregoing pleading has been served upon all interested counsel, by FAX, by hand or by placing copy of same First Class mail, and properly addressed, on February 29, 2008.

/s/ R. Brent Cueria
R. Brent Cueria (#18176)